

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MAY FLOWER INTERNATIONAL,)	
INC.,)	
)	
Plaintiff,)	No. 1:24-cv-04909-OEM-VMS
)	
v.)	
)	
AMOY FOOD LIMITED, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT CONEXUS FOOD SOLUTIONS LLC'S
RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Defendant Conexus Food Solutions LLC f/k/a Best Food Services LLC (Conexus) files this Corporate Disclosure Statement pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and states as follows:

1. The Complaint alleges that the Court has diversity jurisdiction over this action pursuant to 28 U.S.C. §1332. (ECF No. 1, at ¶ 16.)

2. In the Complaint, Plaintiff May Flower International, Inc. alleges that it is a domestic business corporation duly incorporated under the laws of the State of New York with a principal place of business in New York. (ECF No. 1, at ¶ 4.)

3. In compliance with Federal Rule of Civil Procedure 7.1(a)(1), which requires that corporate entities identify any parent corporation and any publicly held corporation owning 10% or more of its stock, Defendant Conexus states as follows:

a. The sole member of Conexus Food Solutions, LLC is United Ventures Specialty Foods, LLC.

b. There are no publicly held corporations owning 10% or more of its stock.

4. In compliance with Federal Rule of Civil Procedure 7.1(a)(2), which requires that corporate entities name and identify the citizenship of every individual or entity whose citizenship is attributed to that corporate entity, Defendant Conexus identifies the following:

- a. The sole member of Conexus Food Solutions, LLC is United Ventures Specialty Foods, LLC.
- b. The sole member of United Ventures Specialty Foods, LLC is Spot Light Investments, LLC.
- c. Spot Light Investments, LLC has the following members:
 - Jessy Zhang Irrevocable Trust. Trustee, Xiao Mou Zhang, is a citizen of Nevada.
 - Julia Zhang Irrevocable Trust. Trustee, Xiao Mou Zhang, is a citizen of Nevada.
 - Justin Zhang Irrevocable Trust. Trustee, Xiao Mou Zhang, is a citizen of Nevada.
 - Anthony Zhang Irrevocable Gift Trust. Trustee, Xiao Yong Zhang, is a citizen of Texas.
 - Bryan Zhang Irrevocable Gift Trust. Trustee, Xiao Yong Zhang, is a citizen of Texas.
 - Colby Zhang Irrevocable Gift Trust. Trustee, Xiao Yong Zhang, is a citizen of Texas.
 - Xiao Zhong Zhang. An individual who is a citizen of California.
 - MYK Trust. Trustee, Jimmy Kwok, is a citizen of Illinois.
 - KMK Trust. Trustee, Jimmy Kwok, is a citizen of Illinois.
 - Jeannie F. Chan 2019 Discretionary Trust F/B/O Marco L. Lam. Trustee, Haiqiong Jiang, is a citizen of Illinois.
 - Jian Jun Zheng. An individual who is a citizen of Georgia.
 - Kai Chuen Wong Gift Trust. Trustee, Yun Yu Yang, is a citizen of Georgia.
 - Rong Hua Dong 2019 Discretionary Trust F/B/O Ting En Huang. Trustee, Ngam Fung Tung, is a citizen of Illinois.

- Rong Hua Dong 2019 Discretionary Trust F/B/O Ting Heng Huang. Trustee, Ngam Fung Tung, is a citizen of Illinois.
- Ngam Fung Tung 2019 Discretionary Trust F/B/O Linda Tung. Trustee, Rong Hua Dong, is a citizen of Illinois.
- Ngam Fung Tung 2019 Discretionary Trust F/B/O Thomas Tung. Trustee, Rong Hua Dong, is a citizen of Illinois.
- Eric T Kwok Trust. Trustee, John Kwok, is a citizen of Illinois.
- David Kwok Trust. Trustee, John Kwok, is a citizen of Illinois.
- John C Kwok Trust. Trustee, Eric Kwok, is a citizen of Illinois.
- Tak Hung Lee. An individual who is a citizen of Indiana.
- ACJL Gift Trust. Trustee, Tak Lee, is a citizen of Indiana.
- Ming D Zhang. An individual who is a citizen of California.
- MJJJ Group, LLC. A limited liability corporation with four members:
 - Mei Lan Liang. An individual who is a citizen of Nevada.
 - Jia Hui Liang. An individual who is a citizen of Nevada.
 - Jimmy Liang. An individual who is a citizen of Nevada.
 - Jefferey Liang. An individual who is a citizen of Nevada.
- Hua Gui Liang. An individual who is a citizen of Nevada.
- Pacific Bird, Inc. is a domestic corporation incorporated in Nevada.
- Geng Lin. An individual who is a citizen of California.
- HKK Ventures LLC. A limited liability corporation with two members:
 - HKK Trust. Trustee, Hei Kang Kwok, is a citizen of New York.
 - MKT Trust. Trustee, May Tung, is a citizen of Illinois.

- Hsiu Ching Lin. An individual who is a citizen of New York.
- Yuchi Chen. An individual who is a foreign national with a Foreign National Tax Address in Nevada.
- Yudi Chen. An individual who is a foreign national with a Foreign National Tax Address in Nevada.
- Sun Jun Zhang. An individual who is a citizen of Texas.

5. Based on the foregoing, for purposes of diversity jurisdiction, CCM is a citizen of Nevada, Texas, California, Illinois, Georgia, Indiana, and New York.

6. The undersigned party understands that under Rule 7.1(b)(2) of the Federal Rules of Civil Procedure, it must promptly file a supplemental statement upon any change in the information that this statement requires.

Dated: New York, New York
September 23, 2024

Respectfully submitted,

THOMPSON COBURN LLP

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*Attorneys for Defendants
Conexus Food Solutions LLC and Best Food
Services, Inc.*

CERTIFICATE OF SERVICE

I hereby certify by my signature above that a true and correct copy of the foregoing instrument has been sent to all attorneys of record in the above-styled and numbered matter on September 23, 2024 via electronic filing/service.

/s/ Brigitte R. Rose